

IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF  
TENNESSEE

LOUISE GRAVES,  
Plaintiff

v.

AUTO-OWNERS  
INSURANCE COMPANY  
Defendant

)  
)  
) No.: 1:22-cv-02296-STA-jay  
)

---

PLAINTIFF'S RESPONSE TO MOTION FOR SANCTIONS

COMES NOW the Plaintiff and Responds to Plaintiffs Response to Motion for Sanctions  
and would show this Honorable Court the following:

Plaintiff incorporates its Memorandum in Support of Response and Exhibits filed  
contemporaneously herewith.

Respectfully submitted,

/s/Drayton D. Berkley  
Drayton D. Berkley, Esq.  
Berkley Law Firm, PLLC  
1255 Lynnfield Ste 226  
Memphis, TN 38119  
[attorneyberkley@gmail.com](mailto:attorneyberkley@gmail.com)  
*Attorney for Plaintiff*  
P.O. Box 771048  
Memphis, TN 38177

**CERTIFICATE OF SERVICE**

I, the undersigned attorney, do hereby certify that the foregoing document has been  
served upon the following counsel of record or parties pro se in this cause **ONLY BY**  
**ELECTRONIC TRANSMISSION** to the following:

Parks T. Chastian, Esq.

Matthew B. Rogers, Esq.  
BREWER, KRAUSE, BROOKS & CHASTAIN, PLLC  
545 MainStream Drive Suite 101  
Nashville, TN 37228  
Attorney for Penn National

This, the 8<sup>th</sup> day of March 2023

/s/Drayton D. Berkley  
Drayton D. Berkley